

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GOLD RESERVE INC.,

Plaintiff,

V.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 22-mc-00453-LPS

**[PROPOSED] ORDER GOVERNING PLAINTIFF GOLD RESERVE INC.'S MOTION
FOR A CONDITIONAL ORDER AUTHORIZING THE ISSUANCE OF A WRIT OF
ATTACHMENT *FIERI FACIAS***

WHEREAS, on October 20, 2022, Plaintiff Gold Reserve Inc. filed its Motion for a Conditional Order Authorizing the Issuance of a Writ of Attachment *Fieri Facias* (D.I. 2) (the “Motion for a Conditional Writ”) as well as its memorandum of law in support and other supporting papers;

WHEREAS, on January 11, 2023, the Court issued its Memorandum Order (D.I. 14) (the “Memorandum Order”) which granted Petróleos de Venezuela S.A.’s (“PDVSA”) request to intervene in this action but denied PDVSA’s request to stay briefing on the Motion;

WHEREAS, the Memorandum Order directed the parties to meet and confer in order to submit by Friday, January 13, 2023: (i) “a joint status report with the parties’ positions on whether there has been any material change to any fact relevant to the factual determination(s) the Court must make with respect to the pending alter ego issues since April 2021” and (ii) a “proposed order the Court may sign to effectuate PDVSA’s intervention as a party and to establish a process for

completing briefing and submission of proposed findings of fact with respect to Gold Reserve's pending motion";

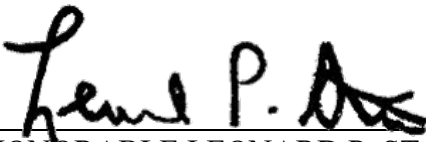
WHEREAS, PDVSA requested a one-week extension to January 20, 2023, to file the proposed order;

WHEREAS, the parties continue to meet-and-confer regarding a joint status report and a process for briefing and submission of proposed findings of fact with respect to Gold Reserve's pending motion, and as such, by and through their undersigned counsel, and subject to the approval of the Court,

IT IS HEREBY ORDERED that:

1. PDVSA's request to intervene in this action is unopposed and is GRANTED.
2. PDVSA's motion to stay briefing in this action is DENIED.
3. The Parties shall file a joint status report and/or a stipulation and proposed order addressing the remaining issues raised in the Court's Memorandum Order and establishing a process for completing briefing and submission of proposed finding of fact with respect to Gold Reserve's pending motion by Friday, January 27, 2023.

SO ORDERED this 23rd day of January, 2023.



HONORABLE LEONARD P. STARK
UNITED STATES DISTRICT COURT